

PROPOSED DISCOVERY PLAN/SCHEDULING ORDER

	DONE	NOT APPLICABLE	DATE
A. ACTIONS REQUIRED BEFORE THE INITIAL CONFERENCE			
1. Rule 26(f) Conference held			January 17, 2023
2. Rule 26(a)(1) disclosures exchanged			January 30, 2023
3. Requested:			
a. Medical records authorization	X		
b. Section 160.50 releases for arrest records	X		
c. Identification of John Doe/Jane Doe defendants	X		
4. Procedures for producing Electronically Stored Information (ESI) discussed	X		
5. Confidentiality Order to be submitted for court approval (see Standing Confidentiality Order on the Chambers website)	X		
B. SETTLEMENT PLAN			
1. Plaintiff to make settlement demand			February 15, 2023
2. Defendant to make settlement offer			April 17, 2023
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date for mediation to be completed)			May 17, 2023 mediation status report due May 22, 2023
4. Settlement Conference (proposed date)			
C. PROPOSED DEADLINES			
1. Motion to join new parties or amend pleadings	X		
2. Initial documents requests and interrogatories			January 17, 2023
3. All fact discovery to be completed (including disclosure of medical records)			April 17, 2023
4. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			May 17, 2023

5. Expert discovery (only if needed)		<i>Check here if not applicable</i>	
Plaintiff expert proposed field(s) of expertise:	N/A		
Defendant expert proposed field(s) of expertise:	N/A		
		DONE	NOT APPLICABLE
a. Affirmative expert reports due	<input checked="" type="checkbox"/>	X	
b. Rebuttal expert reports due	<input checked="" type="checkbox"/>	X	
c. Depositions of experts to be completed	<input checked="" type="checkbox"/>	X	
6. Completion of ALL DISCOVERY (if different from C.3)	<input checked="" type="checkbox"/>		May 16, 2023
7. Joint status report certifying close of ALL DISCOVERY and indicating whether dispositive motion is anticipated	<input checked="" type="checkbox"/>		May 30, 2023
8. If any party seeks a dispositive motion , date to (a) file request for pre-motion conference (if required), or (b) file briefing schedule for the motion	<input checked="" type="checkbox"/>		May 30, 2023
9. Proposed Joint Pre-Trial Order due (if no dispositive motion filed)	<input checked="" type="checkbox"/>		May 30, 2023
D. CONSENT TO MAGISTRATE JUDGE JURISDICTION			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motion?			Yes No <u>X</u>
2. All parties consent to Magistrate Judge jurisdiction for trial?			Yes No <u>X</u>
E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY			
1. Motion for collective action certification in FLSA cases	<input checked="" type="checkbox"/>		N/A
a. Response due	<input checked="" type="checkbox"/>		
b. Reply due	<input checked="" type="checkbox"/>		
2. Motion for Rule 23 class certification	<input checked="" type="checkbox"/>		
a. Response due	<input checked="" type="checkbox"/>		
b. Reply due	<input checked="" type="checkbox"/>		

This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

PEGGY KUO
United States Magistrate Judge

Date